



# GLOBE WIRELESS

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24 Oct. 1995

**VIA COURIER**

Mr. William F. Caton  
Federal Communications Commission  
1919 M Street, N.W. - Room 222  
Washington, D.C. 20554

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Re. PR docket No. 92-257  
Final Comments

Dear Mr. Caton:

Please find attached seven (7) copies of the final comments of Globe Wireless in the above-referenced matter.

If there are any questions, please contact Globe Wireless at 1 415 726 6588.

Respectfully submitted,

Globe Wireless

Peter Kierans

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Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

In the matter of                    )  
  )  
Amendments of the                    )  
Commission's Rules                    )  
Concerning Maritime                    )  
Communications                        )

To: The Commission

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**COMMENTS OF GLOBE WIRELESS**

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**GENERAL**

Globe Wireless believes that there is a general consensus in the marine communications industry that the rule changes being proposed by the Commission are appropriate and will foster a stronger industry with better and lower priced services.

Some further discussion and clarification may be required. We offer only a few comments in reply to specific points raised by several commentors. However, we believe the major issues have been addressed. We ask the Commission to proceed to the rule making phase at its earliest convenience

Globe Wireless hereby submits reply comments on the **Further Notice of Proposed Rule Making** with regard to the following commentors:

1. Nocode
2. BR Communications
3. IBT Local Union No. 9
4. American Trucking Association &  
Association of American Railroads
5. Mobile Marine Radio

## 1. NECODE

We recognize the interests of Necode in wanting to promote the greater use of DSC equipment. However, as commercial marine communications service providers, we see no justification for any investment in DSC equipment at this time. Using alternative technologies, we can accomplish all the commercial messaging functionality of DSC at much lower cost. We do not plan to invest in DSC technology. Other key commercial service providers around the world have made similar decisions. We have a global network of stations and DSC is not part of any one of them. **Recommendation:** The Commission should not, at this time, mandate the use of DSC at marine coast stations.

## 2. BR COMMUNICATIONS

Globe Wireless agrees with BR Communications on many points, especially that the Commission should not mandate any single modulation standard for new maritime communications services. This position will allow new technologies to quickly bring better and lower cost services to the maritime community.

We are concerned that BR's linear FMCW "Chripsounder" technology may interfere with new HF data communications. Both Globe Wireless and Mobile Marine Radio have expressed the need to keep emissions within allocated and licensed band width. The designers of bandwidth efficient digital modulation modes have many challenges. To add to their task the certainty that the spectrum in use will be intruded on by a sweeping signal is unfair. **Recommendation:** "Chripsounding" should only be allowed if a thorough independent investigation shows "Chripsounding" will have no detrimental affect on new and existing uses of the HF spectrum.

## 3. IBT LOCAL UNION NO.9

Globe Wireless would like to correct the record to show that both its HF marine radio stations and those of Mobile Marine Radio cover the Atlantic and Pacific areas, are adequately manned and provide first class service to ships worldwide. Furthermore, the Globe Wireless network covers all oceans worldwide.

#### **4. AMERICAN TRUCKING ASSOCIATIONS & ASSOCIATION OF AMERICAN RAILWAYS**

Globe Wireless recognizes the concerns of these two organizations. There appears to be a conflict of opinion between maritime interests and these two organizations. However, we believe that there is a common interest in improved spectrum efficiency and increased channel availability. We believe the Commission will be able to adequately protect the interests of these two organizations in terms of preventing harmful interference.

**Recommendation:** The Commission establish a "Negotiating Rule Making Committee" with representation from the maritime and land mobile services to formulate plans for spectrum sharing and interference protection.

#### **5. MOBILE MARINE RADIO**

We agree with many of the comments of Mobile Marine Radio. However, we believe the best way to foster new technologies and ensure that they will not interfere with other licensed users of the nearby spectrum, is for the Commission to re-iterate its rules requiring emissions to "stay within their allocated bandwidth". New technical standards can only be written when new technologies have been firmly specified. This type of process would dramatically slow the introduction of new and better maritime services. We are sure that MMR does not want this to happen. To survive, the maritime communications industry needs to move quickly and decisively to introduce services that can compete with satellite based services.

**Recommendation:** The Commission should reaffirm its existing rules.

Respectfully submitted,

Peter Kierans  
Globe Wireless